

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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RENELIO PEREZ, an individual Italian Citizen,  
and OLD MUSIC LIVE, a Polish limited liability  
company,

Case No. 3:25-CV-01103-RAM

Plaintiffs,

- v -

RAUL ALEJANDRO OCASIO RUIZ (p/k/a  
RAUW ALEJANDRO), an individual, and DOES  
1-10,

Defendants.  
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**Stipulation of Voluntary Dismissal Without Prejudice, Tolling of Statute of Limitations,  
and Waiver of Attorneys' Fees**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for Plaintiffs, RENELIO PEREZ and OLD MUSIC LIVE, and Defendant, RAUL ALEJANDRO OCASIO RUIZ (collectively, the "Parties") as follows:

1. Dismissal Without Prejudice. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the Parties hereby stipulate and agree that the above-captioned action shall be voluntarily dismissed without prejudice.
2. Tolling of Statute of Limitations. The Parties further stipulate and agree that the statute of limitations applicable to any and all claims, causes of action, or rights of action that Plaintiffs may have against Defendant that were or could have been asserted in the above-captioned action shall be tolled for a period of two (2) years from the date of this Stipulation (the "Tolling Period"). This tolling provision shall apply to any and all such claims, causes of action, or rights of action, whether arising out of state, federal, or local law. Plaintiffs agree to provide Defendant with written notice (email shall suffice) at least 30 days prior to filing any new lawsuit.
3. Waiver of Attorneys' Fees. The parties agree to bear their own fees and costs incurred through and including this dismissal. Should Plaintiffs re-file this action, Defendant affirms he waives recovery of fees and costs incurred through this dismissal as a putative prevailing party for the above captioned lawsuit (3:25-CV-01103-RAM) pursuant to FRCP 41(d). To be clear, other than the carve out set forth herein pursuant to FRCP 41(d), both Parties reserve and do not waive their respective rights and claims including for recovery of fees and costs incurred.

4. Jurisdiction. The United States District Court for the District of Puerto Rico shall retain jurisdiction over this matter for the purpose of enforcing the terms of this Stipulation.

**I HEREBY CERTIFY** that on this day; I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

Dated: May 22, 2025.

**WHITEFORD, TAYLOR & PRESTON**  
*Attorneys for Plaintiffs*

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